

9-24-84

DECLARATION OF GERALD ARMSTRONG

1
2 1. I am the defendant and cross-complainant in the case of
3 Church of Scientology of California v. Armstrong, Case No.
4 420153.

5 2. I am making this Declaration to support a motion to
6 have plaintiff deliver to me my "auditing" and "ethics" files,
7 now in its or a connected organization's possession.

8 3. During the process of "auditing" in Scientology, a
9 person being "audited," hereinafter referred to as "preclear,"
10 communicates to the auditor, his innermost thoughts and relates
11 incidents from his life which are emotionally charged, embar-
12 rassing or for which he could be blackmailed. The auditor writes
13 down what the preclear says in "auditing reports." The auditor
14 demands and records details such as the time and place when an
15 incident occurred, who was present, who knew about the incident,
16 their relationship to the preclear and their address or general
17 location. These "auditing reports" form, along with the
18 auditor's notes and instructions made after the auditing
19 sessions, the preclear's auditing files. My auditing files are
20 from approximately one thousand hours of auditing and total over
21 two feet in height. These are the files, along with my "ethics"
22 files, and any copies, notes or excerpts from these files, that I
23 seek to have delivered to me.

24 4. When I became involved with Scientology, and when I
25 joined the Sea Organization, I did so in part because of the
26 promises made to me that auditing reports and statements made
27 during auditing were to be absolutely confidential between
28 auditor and preclear. I was told that these statements would

1 never be passed on to others and would not be used against the
2 preclear. I was never told of use of auditing information by the
3 hierarchy of Scientology against preclears, nor of the fact that
4 the hierarchy and the intelligence bureau personnel of Scien-
5 tology had complete access to auditing files. My learning of the
6 actual use to which auditing information is put was a major
7 factor in my leaving the organization. The fact that the organi-
8 zation refuses to turn over my personal records by claiming they
9 are "protected" by the "clergyman-penitent privilege" which they
10 have for decades ignored and abused, is a situation designed by
11 Scientology to bring about my emotional disintegration.

12 5. I seek the delivery to me of my personal auditing and
13 ethics files for a number of reasons. They are my property
14 because they are my statements. Yet, I cannot exert any control
15 over them, and cannot stop the organization's use of these files
16 as long as they remain in Scientology's possession. I seek an
17 understanding from these records of what happened to me during my
18 thirteen years of involvement with Scientology. There are
19 aspects of the mind control by Hubbard and the organization which
20 as yet elude me. I feel that my auditing records will shed a
21 great deal of light on this subject, as well as the subject of
22 the fraud perpetrated by Hubbard and the Scientology organization
23 against me and my emotional well-being. My emotional stability,
24 I feel, was damaged by Scientology, both while I was a member and
25 by the attacks on me after leaving. The continued possession of
26 my personal auditing records and violation of my rights does not
27 allow any emotional healing. The organization and Hubbard and his
28 agents will use the information from my personal auditing files

1 against me, both in and out of the legal arena. I seek to
2 prevent Hubbard and the organization from this abusive action.
3 Hubbard and the organization have labelled me their "enemy" and a
4 "suppressive person" (or one of the 2 1/2 percent most evil
5 people in the world). They do not consider me a friend, and
6 their motivation for retaining my personal auditing files is not
7 friendship or interest in my welfare. They actively seek my
8 destruction.

9 6. During my years of involvement with Hubbard and Scien-
10 tology I learned by direct observation how the organization uses
11 preclear's "confidential" auditing information. While working in
12 the Guardian's Office and L. Ron Hubbard's Communications Bureau,
13 I coded and decoded telexes which contained such information
14 gleaned from auditing files. The information came from the
15 Guardian's Office (or Intelligence Bureau), and without the know-
16 ledge of the preclears. The transmitted information dealt mainly
17 with the preclear's sexual activities, their family, drug use,
18 criminal activity in their past, "buttons" (things which could be
19 used to exert control over the preclears), and things for which
20 the preclears could be blackmailed. In 1980 and 1981 I learned
21 from Guardian's Office operatives that because of its social
22 unacceptability and legal problems they could no longer use
23 auditing information directly. Instead, they gleaned the infor-
24 mation from auditing files and then sought out "third parties" or
25 created "third parties" who could provide the same information.
26 Since the auditing reports contained the time and place where
27 incidents occurred, and who was present or knew about the
28 incident, this was relatively easy to do. In 1980 I was asked by

1 a GO operative to "verify" information taken from the auditing
2 files of Tonja Burden, a young girl then considered an "enemy" of
3 Scientology. The operative knew details from Ms. Burden's
4 "confidential" files and related these to me to see if I could be
5 the "third party" to "provide" the information in a declaration
6 or as a witness.

7 7. A number of times during my involvement with Scien-
8 tology I was ordered, either by Intelligence Bureau personnel or
9 Hubbard's personal agents, to cull usable information from
10 preclears' auditing files. The information culled was written or
11 typed into lists and kept by the GO or Hubbard's agents separate
12 from the auditing files. This was standard practice with anyone
13 who requested to leave or did leave the organization or who was
14 considered in any way a "threat." Undoubtedly it has already
15 occurred with my "confidential" files. The classes of infor-
16 mation I was ordered to extract from auditing reports were:
17 anything concerning the preclear's sexual activities, including
18 time, place, form, event and names and addresses of all sexual
19 partners; any involvement with drugs, including time, place,
20 form, event and names of anyone else involved; any criminal
21 activities with complete details; anything for which the
22 preclears could be blackmailed; any information on family
23 members, friends, associates, connections. In short, the infor-
24 mation sought by the GO and Hubbard's personal agents was
25 intelligence data exactly like that sought and used by the KGB or
26 the Gestapo.

27 8. Only in 1982, after leaving Hubbard's personal staff
28 and the Sea Organization did I find that the practices regarding

1 the use of "confidential" auditing files for intelligence
2 purposes existed as written policy long before I joined the Sea
3 Organization. In a Guardian's Order dated December 16, 1969,
4 entitled PROGRAMME: INTELLIGENCE: INTERNAL SECURITY, Mary Sue
5 Hubbard, then directly responsible to L. Ron Hubbard, wrote:

6 "VITAL TARGETS:

7 1. This Programme is to be done by the Asst.
8 Guardian or the D/A/Guardian for Intelligence,
9 if this post is held separately.

10 2. To establish intelligence files on all
11 such persons found to be infiltrators, double
12 agents, and disaffected staff members, Scien-
13 tologists and relatives of Scientologists.

14 OPERATING TARGETS:

15 1. To make full use of all files on the
16 organization to effect your major target.
17 These include personnel files, Ethics files,
18 Dead files, Central files, training files,
19 processing files and requests for refunds.

20 2. To assemble full data by investigation of
21 each person located for possible use in case
22 of attack or for use in preventing any attack
23 and to keep files of such." (This document was
24 introduced and admitted into evidence at the
25 trial of the underlying action against me.)

26 If I had known of this policy and practice in 1969 I would never
27 have become involved with Scientology.

28 9. The public statement by Hubbard and the Scientology

1 organizations is that the purpose of auditing is to free
2 individuals. Yet the real use to which auditing is put is to
3 entrap and control individuals. Many of the people in Scien-
4 tology are Hubbard's unwitting dupes; they believe that, to some
5 degree at least, their participation in the covert and illegal
6 use of confidential auditing files has something to do with
7 freeing individuals. Hubbard's personal writings during the
8 period of his creation of Dianetics and Scientology, however,
9 reveal a completely different and very non-altruistic motivation.
10 In these writings, now under seal in the Court, Hubbard wrote
11 that he would control this sector of the Universe, that all men
12 will bow down to his will, and that he has the right to use men's
13 minds. There are approximately two hundred pages of such
14 writings presently under seal. These reveal Hubbard's intent to
15 control people, his utter disregard for individuals' rights and
16 his megalomania. The illegal use to which he and his organ-
17 ization have put and do put preclears' statements, made in
18 confidence, fit with the pattern of Hubbard's life and his mental
19 state as shown in the sealed documents.

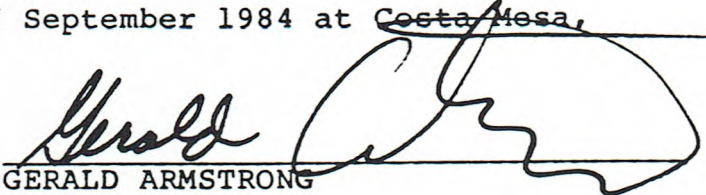
20 10. It is clear to me that the priest-penitent privilege
21 means nothing to Hubbard or the Scientologists he controls, other
22 than as a vehicle to prevent the preclear from exerting his
23 privilege, and at the same time selectively using the information
24 from the files not relinquished to the preclear because they are
25 "privileged." It is just this sort of convoluted perversion of
26 the law and the individual's rights which has been Hubbard's
27 modus operandi for more than thirty years.

28 11. It is very clear that the refusal to deliver to me my

1 "auditing" and "ethics" files, which have no possible legal use
2 to Hubbard or the organization, is simply harassment. I am
3 deeply disturbed by the abuses and harassment by Hubbard and the
4 people he controls and their desire to ruin me.

5 I declare under penalty of perjury that the foregoing is
6 true and correct.

7 Executed this 24th day of September 1984 at ~~Costa Mesa,~~
8 California.

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10 GERALD ARMSTRONG

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